173330



BellSouth Telecommunications, Inc. Legal Department 1600 Williams Street Suite 5200 Columbia, SC 29201

patrick.turner@bellsouth.com

Patrick W. Turner General Counsel-South Carolina

803 401 2900 Fax 803 254 1731

March 28, 2005

Mr. Charles Terreni Chief Clerk of the Commission Public Service Commission of South Carolina Post Office Drawer 11649 Columbia, South Carolina 29211

Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region InterLATA Services Pursuant to Section 271 of the Telecommunications

Act of 1996

Docket No. 2001-209-C

Dear Mr. Terreni:

Enclosed for filing are the original and 10 copies of BellSouth Telecommunications, Inc.'s ("BellSouth's") performance data change Notification Reports for April 2005 and preliminary May 2005. These data change Notification Reports are being provided to inform the Commission of the changes BellSouth plans to make to its Performance Measures Analysis Platform ("PMAP") with April data, and previews the changes BellSouth is considering making for May data. A Data Disclosure Report for March 2005 would be filed at this time as well, if needed; however, for March 2005 there are no additional South Carolina validated data issues to be disclosed that affect performance measurement calculations for which a fix has not yet been scheduled.

There is one additional matter that BellSouth would like to bring to the attention of the Commission and the parties. Upon completion of Encore Release 17.0, which was

Mr. Charles Terreni March 28, 2005 Page 2

implemented on November 21, 2004, it was determined that some LSRs previously counted as Partially Mechanized were being incorrectly counted as Fully Mechanized. BellSouth corrected this issue with the January 2005 data month.

Sincerely,

atrick W. Turner

PWT/nml Enclosure

cc: All Parties of Record

DM5 # 578506

PROPOSED APRIL 2005 DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the April 2005 data month. Results for the April 2005 data month will be posted as follows:

Preliminary results May 20, 2005 Final results May 31, 2005

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement ("SQM") Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

ENCORE Releases may affect monthly data flows from the source systems (e.g., LEO, LESOG, etc.) that PMAP uses to calculate measurements. Bellsouth will make changes to PMAP to ensure that data continues to be correctly captured as ENCORE Releases are implemented.

Ordering Measurements

(1) Affected Measures: O-3 & O-4

Description of Change: Currently, the Flow-Through code is incorrectly counting LSRs submitted via ELMS6 to cancel previous submissions as BST errors. BellSouth proposes to correctly classify these LSRs as Flow-Through. This proposed change was Item (1) on the Preliminary April Data Notification filed on February 1, 2005. (RQ6010)

Impact of Change: For December 2004 data, there were 1036 of these LSRs. Flow Through percentages would have increased less than 1%.

(2) Affected Measures: O-3 & O-4

Description of Change: Currently, Flow-Through LSRs submitted via XML or EDI, which have related PONs (RPONs) and are manually clarified, are being incorrectly counted as BellSouth errors. BellSouth proposes to correct the code to accurately report these LSRs as CLEC errors. This proposed change was Item (2) on the Preliminary April Data Notification filed on February 1, 2005. (RQ6011)

Impact of Change: For November 2004, there would have been a .002% increase in the results.

(3) Affected Measures: OSS-2

Description of Change: Currently, performance for EDI interactive agent is not reported for this measure. BellSouth proposes to report interactive agent availability minutes as a part of EDI. (RQ6078)

Impact of Change: From August 2004 to January 2005, there were no interactive agent outages.

(4) Affected Measures: OSS-2

Description of Change: Currently, the raw data for OSS-2 includes a listing for CLEC TAFI, LMOS, and TAFI records, which are associated only with the M&R Interface Availability Measure (OSS-3). BellSouth proposes to remove this erroneous raw data from the file. (RQ6164)

Impact of Change: None to measurement results.

Provisioning Measurements

(5) Affected Measures: P-2A

Description of Change: When CSOTS was established, it was updated once a day. To account for the possibility that a CLEC might not be notified of a Non-Mechanized Jeopardy status for up to one day after it occurred, the Non-Mechanized Jeopardy Notice Interval was reduced by 1 day. CSOTS is now updated real time and BellSouth proposes to modify the PMAP code to report the actual measured Jeopardy Notice Interval. This proposed change was Item (3) on the Preliminary April Data Notification filed on February 1, 2005. (RQ5998)

Impact of Change: For November 2004, in Georgia, the Non-Mechanized Average Jeopardy Notice Interval (provided in advance of jeopardy) for DS1Loops would increase by 8.87%.

(6) Affected Measures: P-4

Description of Change: Currently, the CLEC numerator on the 12 month report is reported in whole rounded numbers. BellSouth proposes to change the CLEC numerator on the report to 2 decimal places which is already used to calculate the result. This

proposed change was Item (4) on the Preliminary April Data Notification filed on February 1, 2005. (RQ6029)

Impact of Change: None to measurement results.

Change Management Measurements

(7) Affected Measures: CM-8

Description of Change: Currently, the report for this measurement is not disaggregated as stated in the SQM. BellSouth proposes to correct PMAP to correctly display these disaggregations. (RQ6071)

Impact of Change: None to the aggregate measurement results.

PRELIMINARY MAY 2005 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the May 2005 data month. Results for the May 2005 data month will be posted as follows:

Preliminary results June 20, 2005 Final results June 30, 2005

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

ENCORE Releases may affect monthly data flows from the source systems (e.g., LEO, LESOG, etc.) that PMAP uses to calculate measurements. Bellsouth will make changes to PMAP to ensure that data continues to be correctly captured as ENCORE Releases are implemented.

Provisioning Measurements

(1) Affected Measures: P-3 (Florida and Tennessee)

Description of Change: Currently in Florida & Tennessee, BellSouth is excluding orders that are canceled on the due date but are not zero due dated orders. Per the SQM, only orders canceled prior to the due date and zero due dated orders canceled on the due date should be excluded from this measure. BellSouth proposes to exclude only orders canceled prior to the due date and zero due dated orders canceled on the due date from this measure. (RO6033)

Impact of Change: There is no change in reported measurement results for BST. The impact to the CLEC results is less than 0.01%.

(2) Affected Measures: P-2, P-3, P-4, P-5, P-6, P-9, P-10 & P-11

Description of Change: Currently, certain administrative orders (i.e., "C" orders with D&E entries) were not being excluded in the code. BellSouth proposes to correct the code to properly exclude these orders. (RQ6039)

Impact of Change: For November 2004, in Florida, for PMIA BellSouth Retail Residence, 19843 records would have been excluded from the volume of completed orders with a change in the missed appointment rate from .67% to .69%. For Florida CLEC Resale Residence, one (1) record would have been excluded from the volume of completed orders with no change in the missed appointment rate (.37%).

(3) Affected Measures: P-7, P-7A, P-7B & P-7C

Description of Change: Currently, records are being excluded because WFA completion dates and service order completion dates do not match. BellSouth proposes to modify PMAP data processing to include these records if the WFA completion date is within 10 days of the service order completion date. A 10-day interval should capture virtually all instances for this situation. (RQ6059)

Impact of Change: For December 2004, in Florida, two service orders (4 items) were excluded from CCCI. The results were:

929/933 = 99.5712% Adjusted results: 933/937 = 99.5731%

For December 2004, in Georgia, three service orders (13 items) were excluded from CCCI. The results were:

209/209 = 100%

Adjusted results:

222/222 = 100%

M&R Measurements

(4) Affected Measures: MR-3 (Florida and Tennessee)

Description of Change: Currently, the Z scores are not being calculated for Digital Loops <DS1 and Digital Loops >= DS1. Bellsouth proposes to begin calculating the Z score for Digital Loops <DS1 and Digital Loops >=DS1 product groups. (RQ6112)

Impact of Change: None to measurement results.

STATE OF SOUTH CAROLINA)	
)	CERTIFICATE OF SERVICE
COUNTY OF RICHLAND)	

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused the BellSouth Telecommunications, Inc.'s Proposed April 2005 Data Notification Report and Preliminary May 2005 Data Notification Report in Docket No. 2001-209-C to be served upon the following this March 28, 2005:

Florence P. Belser, Esquire General Counsel Office of Regulatory Staff Post Office Box 11263 Columbia, SC 29211 (U. S. Mail and Electronic Mail)

Sonia Daniels
Law & Government Affairs
AT&T – Southern Region
1200 Peachtree Street, NE, Rm. 4080
Atlanta, Georgia 30309
(AT&T)
(U. S. Mail and Electronic Mail)

Jocelyn G. Boyd, Esquire Staff Attorney S. C. Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211 (PSC Staff) (U. S. Mail and Electronic Mail)

Russell B. Shetterly, Esquire
P. O. Box 8207
Columbia, South Carolina 29202
(Knology of Charleston and Knology of South Carolina, Inc.)
(U. S. Mail and Electronic Mail)

2005 MAR 28 FM 1:08



Darra W. Cothran, Esquire
Woodward, Cothran & Herndon
1200 Main Street, 6th Floor
Post Office Box 12399
Columbia, South Carolina 29211
(MCI WorldCom Network Service, Inc.
MCI WorldCom Communications and
MCImetro Access Transmission Services, Inc.)
(U. S. Mail and Electronic Mail)

John F. Beach, Esquire
John J. Pringle, Jr., Esquire
Ellis Lawhorne & Sims, P.A.
Post Office Box 2285
Columbia, South Carolina 29202
(Resort Hospitality Services, Inc., NuVox
Communications, Inc., AIN and Momentum Business
Solutions, Inc.)

(U. S. Mail and Electronic Mail)

Marsha A. Ward, Esquire Kennard Woods, Esquire MCI WorldCom, Inc. Law and Public Policy 6 Concourse Parkway, Suite 3200 Atlanta, Georgia 30328 (MCI)

(U. S. Mail and Electronic Mail)

Frank R. Ellerbe, Esquire
Bonnie D. Shealy, Esquire
Robinson, McFadden & Moore, P.C.
1901 Main Street, Suite 1200
Post Office Box 944
Columbia, South Carolina 29202
(SCCTA)
(U. S. Mail and Electronic Mail)

Genevieve Morelli Kelley, Drye & Warren, LLP 1200 19th Street, N.W. Washington, D.C. 20036 (KMC Telecom III, Inc.) (U. S. Mail and Electronic Mail) John D. McLaughlin, Jr.
Director, State Government Affairs
KMC Telecom, Inc.
1755 North Brown Road
Lawrenceville, GA 30043
(KMC Telecom)
(U. S. Mail and Electronic Mail)

William R. Atkinson, EsquireAttorney 3065 Cumberland Circle Mailstop GAATLD0602 Atlanta, Georgia 30339 (Sprint/United Telephone) (U. S. Mail and Electronic Mail)

Scott A. Elliott, Esquire
Elliott & Elliott
721 Olive Street
Columbia, South Carolina 29205
(Sprint/United Telephone)
(U. S. Mail and Electronic Mail)

Marty Bocock, Esquire
Director of Regulatory Affairs
1122 Lady Street, Suite 1050
Columbia, South Carolina 29201
(Sprint/United Telephone Company)
(U. S. Mail and Electronic Mail)

Faye A. Flowers, Esquire
Parker Poe Adams & Bernstein LLP
1201 Main Street, Suite 1450
Columbia, South Carolina 29202
(US LEC)
(U. S. Mail and Electronic Mail)

Andrew O. Isar
Director – State Affairs
7901 Skansie Avenue, Suite 240
Gig Harbor, WA 98335
(ASCENT)
(U. S. Mail and Electronic Mail)

Nanette Edwards, Esquire ITC^DeltaCom Communications, Inc. 4092 S. Memorial Parkway Huntsville, Alabama 35802 (U. S. Mail and Electronic Mail)

Timothy Barber, Esquire
Womble, Carlyle, Sandridge & Rice
3300 One First Union Center
301 South College
Suite 3300
Charlotte, North Carolina 20202
(AT&T)
(U. S. Mail and Electronic Mail)

Tami Azorsky, Esquire McKenna & Cuneo, LLP 1900 K Street, N.W. Washington, DC 20006 (AT&T) (U. S. Mail and Electronic Mail)

William Prescott, Esquire 1200 Peachtree Street, N.E. Suite 8100 Atlanta, Georgia 30309 (AT&T) (U. S. Mail and Electronic Mail)

PC Docs # 401224